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March 19, 2013

Ms. Ashley Carter
Senior Campaign Finance Analyst
Federal Election Commission
Washington, DC 20463

Committee ID: C00521013
RE: Amended Pre-General Quarterly Report (10/01/2012-10/17/2012), Filed 12/6/2012

Dear Ms. Carter,

I am writing as counsel to Florida Freedom PAC (FFP) in response to the Commission's request for additional information related to several items disclosed on the committee's Amended Pre-General Quarterly Report.

The Commission inquired about an address missing from itemized disbursements supporting Line 21(b). The committee has filed an amended report to include the missing address.

In addition, the Commission has inquired about the disclosure of reimbursements to staff and other individuals for travel, subsistence and other expenses on Schedule B, supporting Line 21(b). While the committee collected the appropriate information for all reimbursements, in many cases the payments to the original vendors did not cross the \$200 itemization threshold, and thus did not itemize on the report. However, on the amended report, the committee has updated the language on these reimbursements to disclose that.

Regarding your question relating to petty cash, the committee has made best efforts to follow Commission regulations regarding petty cash disbursements, and found that itemizations were not required. The committee will continue to monitor its procedures regarding petty cash and ensure that itemizations are reported when needed.

Finally, the Commission has asked about 48-hour notices for independent expenditures which were not itemized on the amended report. When the committee originally filed 48-hour notices for independent expenditures to disclose canvassing activity, the notices contained estimates for what the anticipated month's activity would be. The committee has since filed an amended Pre-General report on 2/14/2013 which reflects a more detailed and accurate itemization of the 48-hour notices that were previously filed. Thus, this should correct the issue of the discrepancy between the two reports.

If you have any further questions regarding this matter, please feel free to contact me at 202-328-3500.

Very truly yours,

John Pomeranz
Counsel to Florida Freedom PAC

cc: Gihan Perera, Treasurer, Florida Freedom PAC
